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ENVIRONMENTAL CHECKLIST

Purpose of Checklist

The State Environmental Policy Act (SEPA), chapter 43.21 RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from your proposal, if it can be done) and to help the agency decide whether an EIS is required.

Instructions for Applicants

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply". Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Use of Checklist for Nonproject Proposals

Complete this checklist for nonproject proposals, even though questions may be answers "does not apply". IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (Part D).

For nonproject actions, the references in the checklist to the words "project", "applicant", and "property or site" should be read as "proposal", "proposer", and "affected geographic area", respectively.

A. BACKGROUND

1. Name of proposed project, if applicable:

Interim Remedial Action for Drum Burial Area, Former Pacific Powder Site

2. Name of applicant:

Citifor, Inc.

3. Address and phone number of applicant and contact person:

Steve Germiot
Aspect Consulting
811 First Avenue Suite 480
Seattle, WA 98104
(206) 838-5830

4. Date checklist prepared:

November 19, 2004

5. Agency requesting checklist:

Washington State Department of Ecology
Southwest Regional Office
Toxic Cleanup Program
P.O. Box 47775
Olympia, WA. 98504-7775
Contact: Mike Blum (Site Manager)
Phone: (360) 407-6262

6. Proposed timing or schedule (including phasing, if applicable):

Interim Remedial Action Plan (IRAP) followed by remediation construction. The interim remedial action is planned for completion in 2005. A schedule is contained in the IRAP (Table 5).

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

After interim remedial action is completed, determination of final cleanup remedy for the site will occur as part of the Agreed Order with Ecology.

8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

Conrex Inc. 1998. Drum Waste Characterization and Disposal Investigation, Former Pacific Powder Company. Prepared for Dyno Nobel, Inc. May 8, 1998.

Waste Management 1998. Remediation Work Plan for Excavation of Buried Drums and Debris. July 20, 1998.

ONYX 2000. Report of Findings and Activities, Former Hercules Powder Company Site. March 30, 2000.

Hart Crowser 2000. Cleanup Action Objectives and Focused Feasibility Study, Drum Burial Area. May 17, 2000.

Hart Crowser 2001. Summary of Well Installation and Groundwater Monitoring Results, Drum Burial Area. August 17, 2001.

Hart Crowser 2002. Dinitrotoluene (DNT) Soil Cleanup Levels, Former Hercules Powder Site. February 8, 2002.

Hart Crowser 2002. Pre-Excavation Sampling and Analysis (Plan), Drum Burial Area. June 18, 2002.

Hart Crowser 2003. Results of Pre-Excavation Sampling and Analysis Program, Drum Burial Area. February 18, 2003.

Hart Crowser 2003. Draft Interim Remedial Action Plan, Drum Burial Area. August 14, 2003.

9. **Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

- Agreed Order (including Interim Remedial Action Plan) will undergo a public comment period before it is approved by Ecology.
- Thurston County is evaluating a permit application for gravel mining at the former Pacific Powder property. The Drum Burial Area is not within the mine boundary.

10. **List any government approvals or permits that will be needed for your proposal, if known.**

- Approval of Agreed Order and the Interim Remedial Action Plan.
- Compliance with substantive requirements of Thurston County filling and grading permit requirements.

11. **Give brief, complete description of your proposal, including the proposed uses and the site of the project. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

The Drum Burial Area is approximately 6 acres in size and is located within about 1,625 acres owned by Citifor. The interim remedial action to be performed in the Drum Burial Area includes the following elements:

- Pre-excavation trenching investigation to confirm extent of buried drums around the perimeter of the known Drum Burial Area;
- Pre-excavation sampling and analysis to better define the extent of DNT-impacted soil in the vicinity of Excavation 1 Trench 6 (test pit location HC-EX1-T6A) and the eastern portion of Excavation 3 (test pit locations HC-EX3-BS20 and HC-EX3-BS2);
- Excavation, on-site screening, on-site stockpiling, and off-site disposal of residual soils containing total DNT concentrations greater than 0.11 mg/kg within Excavations 1 and 3;
- Post-excavation verification sampling and analysis to confirm that residual in-place soils meet the MTCA threefold cleanup criteria (WAC 173-340-740[7]);
- Off-site disposal of site stockpiled soils containing total DNT concentrations greater than 0.11 mg/kg; and

Four quarters of groundwater monitoring upon completion of remediation activities. If contaminant concentrations measured in site groundwater are below applicable cleanup levels for four successive quarters, groundwater monitoring will be discontinued. If groundwater cleanup levels are not met following one year of quarterly monitoring, Ecology will be consulted to evaluate the need for additional groundwater monitoring.

12. **Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or details plans submitted with any permit applications related to this checklist.**

The Drum Burial Area is located in the northern portion of the former Pacific Powder property, which is an approximately 1,625-acre site located about 2 miles east of Maytown (Township 16 N, Range 2W, Section 1, Quarter-Quarter SW SW). Vicinity and site plans are presented on Figures 1 and 2 in the IRAP.

TO BE COMPLETED BY APPLICANT:**EVALUATION FOR
AGENCY USE ONLY****B. ENVIRONMENTAL ELEMENTS****1. Earth****a. General description of the site (circle one):**

Flat, rolling, hilly, steep slopes, mountainous, other:

Generally flat with hillsides located roughly 600 feet to the north of the Drum Burial Area.

b. What is the steepest slope on the site (approximate percent slope)?

Less than 1 percent except within the previous cleanup excavation. Open trenches within the excavated area are generally less than 4 feet deep.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Soils beneath the site are predominantly recessional outwash deposits of sand and gravel.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Not to our knowledge.

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

Up to 1,000 cubic yards of soil will be excavated. Approximately 40% of the material excavated will be large gravel (1-inch plus) that will be mechanically screened and placed back into the excavation. Soil from the northeastern corner of the property, which Ecology has determined is not contaminated (letter from Mike Blum dated February 20, 2004), may also be used for excavation backfill.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Some erosion within the areas of excavation or from soil stockpile areas could occur.

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- g. **About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

There are no plans to cover the Drum Burial Area with impervious surfaces as part of this interim remedial action.

- h. **Proposed measures to reduce or control erosion, or other impacts to the earth, if any:**

Stockpiled soil will be covered to minimize precipitation contact and runoff. Engineering controls such as berms, temporary covers, and other best management practices will be used to control erosion, runoff, and runoff as described in Section 6 of the IRAP. The best management practices will meet substantive requirements of Thurston County's Drainage Design and Erosion Control Manual.

2. **Air**

- a. **What type of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.**

Some dust may be produced from excavation, soil screening, and stockpiling activities.

- b. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

No.

- c. **Proposed measures to reduce or control emissions or other impacts to air, if any:**

Dust will be minimized during excavation using best management practices. This will include, as necessary, covering of stockpiles and wetting of soil during excavation and screening.

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3. Water

a. Surface:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

There is no surface water body on or in the immediate vicinity of the Drum Burial Area. Beaver Creek is the closest stream, located approximately 4,000 feet south of the Drum Burial Area. Wetlands adjacent to Beaver Creek extend within approximately 2,000 feet of the Drum Burial Area. Beaver Creek discharges to the Black River more than 6 miles west of the Drum Burial Area. Allen Creek is located approximately 1 mile west of the Drum Burial Area; this creek discharges to Deep Lake approximately 1.5 miles northwest of the Drum Burial Area.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

No.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

None.

- 4) Will the proposal require surface water withdrawals or diversion? Give general description, purpose, and approximate quantities if known.**

No.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

No.

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- 6) **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

No.

b. Ground:

- 1) **Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.**

No dewatering is anticipated during excavation. Excavation activities will be limited to unsaturated zone soil.

- 2) **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals ...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

None.

c. Water Runoff (including storm water):

- 1) **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

During construction, surface water runoff will be controlled and confined to the Drum Burial Area site as described in Section 6 of the IRAP. The Drum Burial Area contains highly permeable coarse-grained sand and gravel soils, thus runoff will readily infiltrate rather than flowing overland for any appreciable distance.

- 2) **Could waste materials enter ground or surface waters? If so, generally describe.**

DNT could leach from DNT-contaminated soil to groundwater if not controlled (controls to be implemented are described in the next response).

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- d. **Proposed measures to reduce or control surface, ground, or runoff water impacts, if any:**

The excavation will remove DNT-impacted soil from contact with precipitation and potential migration to groundwater, thereby reducing potential impacts in the long term. During the removal action, best management practices (e.g., stockpile covering, berming, and leachate collection) will be used to control erosion, runoff, and runoff as described in Section 6 of the IRAP.

4. **Plants**

- a. **Check or circle types of vegetation found on the site:**

☒ deciduous tree: alder, maple, aspen, other

☒ evergreen tree: fir, cedar, pine, other

☒ shrubs

☒ grass

☐ pasture

☐ crop or grain

☐ wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other

☐ water plants: water lily, eelgrass, milfoil, other

☐ other types of vegetation

- b. **What kind and amount of vegetation will be removed or altered?**

Vegetation within the Drum Burial Area consists primarily of scotch broom. This vegetation will be removed during remedial excavation activities. Removal of evergreen trees located in the vicinity is not anticipated.

- c. **List threatened or endangered species known to be on or near the site.**

None known.

- d. **Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:**

None at this time.

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5. Animals

- a. **Circle or underline any birds or animals that have been observed on or near the site or are known to be on or near the site:**

birds: hawk, heron, eagle, songbirds, other: _____

mammals: deer, bear, elk, beaver, other: _____

fish: bass, salmon, trout, herring, shellfish, other: _____

- b. **List any threatened or endangered species known to be on or near the site.**

No threatened or endangered species are known to exist in or immediately adjacent to the Drum Burial Area. The Mardon skipper and Whulge checkerspot may be located about 2,400 feet east of the Drum Burial Area in the native outwash prairie. Wetland A, located 2,000 or more feet south of the Drum Burial Area, contains the Oregon Spotted Frog. Coho salmon are reported in Beaver Creek, located 4,000 or more feet from the Drum Burial Area. These four species have a federal status of "federal candidate" but are not threatened or endangered.

- c. **Is the site part of a migration route? If so, explain.**

Yes. Pacific Flyway.

- d. **Proposed measures to preserve or enhance wildlife, if any:**

None.

6. Energy and Natural Resources

- a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

Excavation, well installation, soil screening activities, and trucking for off-site disposal will involve heavy equipment that uses petroleum fuel.

- b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

No.

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- c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:**

None proposed.

7. Environmental Health

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.**

DNT-contaminated soils will be encountered during construction work.

- 1) **Describe special emergency services that might be required.**

None anticipated.

- 2) **Proposed measures to reduce or control environmental health hazards, if any:**

Construction work at the site will adhere to Health and Safety Plan consistent with OSHA and State Labor and Industry standards (see Appendix C of IRAP).

b. Noise

- 1) **What types of noise exist in the area which may affect your project (for example: traffic, equipment operation, other)?**

None.

- 2) **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from site.**

Heavy equipment and truck traffic will add noise in the short-term. Hours of noise production would be restricted to normal daylight working hours.

TO BE COMPLETED BY APPLICANT:**EVALUATION FOR
AGENCY USE ONLY****3) Proposed measures to reduce or control noise impacts, if any:**

Hours of noise production would be restricted to normal daylight working hours.

8. Land and Shoreline Use**a. What is the current use of the site and adjacent properties?**

The Drum Burial site is currently inactive and is zoned Rural Residential (1 unit per 5 acres). The portion of the property west of the Drum Burial Area is zoned Rural Industrial. Adjacent properties are industrial, residential, or undeveloped.

b. Has the site been used for agriculture? If so, describe.

The site was used as pastureland for cattle prior to 1965.

c. Describe any structures on the site.

No structures are present on the Drum Burial Area.

d. Will any structures be demolished? If so, what?

No.

e. What is the current zoning classification of the site?

The Drum Burial Area is within the portion of the property that is zoned Rural Residential (1 unit per 5 acres).

f. What is the current comprehensive plan designation of the site?

The Drum Burial Area is within the portion of the property that is designated Rural Residential (1 unit per 5 acres).

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable.

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- h. **Has any part of the site been classified as an “environmentally sensitive” area? If so, specify.**

Not within the Drum Burial Area.

- i. **Approximately how many people would reside or work in the completed project?**

No development is currently planned for the Drum Burial Area.

- j. **Approximately how many people would the completed project displace?**

None.

- k. **Proposed measures to avoid or reduce displacement impacts, if any:**

None.

- l. **Proposed measures to ensure the proposal is compatible with existing and project land uses and plans, if any:**

Not Applicable.

9. **Housing**

- a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

None.

- b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

None.

- c. **Proposed measures to reduce or control housing impacts, if any:**

Not applicable.

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AGENCY USE ONLY****10. Aesthetics**

- a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

No buildings are planned for this site.

- b. **What views in the immediate vicinity would be altered or obstructed?**

None.

- c. **Proposed measures to reduce or control aesthetic impacts, if any:**

Not applicable.

11. Light and Glare

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?**

None.

- b. **Could light or glare from the finished project be a safety hazard or interfere with views?**

Not applicable.

- c. **What existing off-site sources of light or glare may affect your proposal?**

None.

- d. **Proposed measures to reduce or control light and glare impacts, if any:**

None.

12. Recreation

- a. **What designated and informal recreational opportunities are in the immediate vicinity?**

None.

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- b. **Would the proposed project displace any existing recreational uses? If so, describe.**

No.

- c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

None.

13. Historic and Cultural Preservation

- a. **Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.**

No.

- b. **Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.**

Not applicable.

- c. **Proposed measures to reduce or control impacts, if any:**

Not applicable.

14. Transportation

- a. **Identify public streets and highways serving the site, and describe the proposed access to the existing street system. Show on site plans, if any.**

Tilley Road provides the main access to the site. See Figure 1 of the IRAP.

- b. **Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?**

No. The nearest transit stop is unknown.

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- c. **How many parking spaces would the completed project have? How many would the project eliminate?**

No parking will be completed or eliminated.

- d. **Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).**

No.

- e. **Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

The Drum Burial Area is located approximately 500 feet south of the Tacoma Western Railway. The project does not intend to use rail transportation at this time.

- f. **How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.**

During excavation activities, additional truck traffic will include 2 to 6 additional vehicle trips per day for a few days to gain access and egress to the site. During transport of soil off site, 10 to 20 additional vehicle trips per day for less than 3 weeks are anticipated. Peak volumes will likely occur between 6:00 am and 2:00 pm during weekdays. No additional vehicle trips will occur upon completion of the remediation work at the site.

- g. **Proposed measures to reduce or control transportation impacts, if any.**

None.

15. **Public Services**

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.**

No.

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- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

Not applicable.

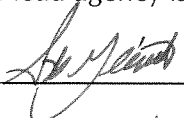
16. Utilities

- a. **Circle or underline utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.**
- b. **Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in immediate vicinity which might be needed.**

No additional utilities are required.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand the lead agency is relying on them to make its decision.

Signature: 

Date submitted: 12/8/04

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